

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**TODD BOBO, individually and on behalf  
of all others similarly situated,**

**Plaintiff,**

**v.**

**CLOVER NETWORK, LLC,**

**Defendant.**

**Case No. 1:22-cv-22338-BB**

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendant Clover Network, LLC hereby moves pursuant to Federal Rule of Civil Procedure 6(b) to extend its time to file a response to the Complaint (Dkt. No. 3) from August 18, 2022 to September 16, 2022.

This request is made in good faith and not for the purpose of delay. Counsel for Clover Network, LLC, who was recently retained, continues to review the allegations of the Complaint and requires additional time to respond to the same. Counsel for Clover Network, LLC does not yet have sufficient background information to reasonably formulate a response to the Complaint. Thus, good cause exists to extend the time by which Clover Network, LLC is required to respond. Additionally, pursuant to Local Rule 7.1(a)(3), Counsel for Clover Network, LLC communicated with counsel for Plaintiff, who consent to the requested extension. Thus, if this Court grants this request, this extension will not prejudice Plaintiff or delay progression of the case.

WHEREFORE, Defendant Clover Network, LLC respectfully requests that the Court enter an Order granting this Consent Motion for Extension of Time to Respond to Complaint and providing Clover Network, LLC until September 16, 2022 to respond to the Complaint.

Dated: August 11, 2022

Respectfully submitted,



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